REMARKS

Claims 1-5, 7-9, 12, 17-18, 25-27 are pending but stand rejected. That rejection has been made final. In view of the following remarks, the Applicant respectfully requests the Examiner's thoughtful reconsideration. In particular, the Applicant wishes to point out that the Examiner has mischaracterized Claim 1. asserting that Gunji teaches a database of records that include, among other items, "one or more substitute printer driver identifications associated with" a given printer type identification. To the contrary Claim 1, as clearly reproduced below, recites "a database having a plurality of data records, each of the plurality of data records including", among other items, "a plurality of substitute printer driver identifications." The term plurality infers two or more while the Examiners mischaracterization dictates one or more. For this reasons alone, the rejection of Claim 1 cannot stand.

Claim Rejections – 35 USC §102: Claims 1-9, 17, 19-20, 23-28 and 30 stand rejected as being anticipated by US Pub 2003/0065755 to Gunji. Claims 6, 19, 20, 23, 24, 28, and 30 have been cancelled and will not be addressed.

Claim 1 is directed to a system that, as amended, includes a server. That server is configured to:

1. maintain a database having a plurality of data records, each of the plurality of data records including a printer type identification, a plurality of substitute printer driver identifications associated with the printer type identification, and a compatibility rating associated with each substitute printer driver identifications;

2. communicate one of the plurality of data records via the network and receive a response identifying a selected one of the plurality of substitute printer driver identifications included in the communicated data record; and

3. cause a printer driver identified by the selected substitute printer driver identification to derive print ready data file for future print requests directed

to a printer of the particular type identified by the printer type identification that is associated with the selected substitute printer driver identification.

Addressing Claim 1, the Examiner maps the elements of Claim 1 to Gunji as follows:

Recited Element of Claim 1	Mapping to Gunji
maintain a database having	Driver database(22); Gunji Fig. 2; paragraphs [0054], [0057]
a plurality of data records – each data record containing	Gunji, Fig. 1 and paragraph [0049] (equating printer drivers stored in drivers database 22)
a printer type identification	PRT1 and PRT2, Gunji, Fig. 1, paragraph [0049].
"one or more substitute printer type identifications associated" **(mischaracterization of Claim 1)**.	Gunji, paragraph [0051] (depending on the user information such as the operating system and version)
and a compatibility rating associated with each substitute printer type identification.	Gunji, paragraph [0004] (the driver that is most compatible for the user is dependent upon the selected printer and the user's operating system).

Gunji mentions its driver database (22) in paragraphs [0054] and [0057] and nowhere else. At best the driver database (22) includes printer drivers for printers identified as PRT1 and PRT2 in Fig. 1. Gunji's printer driver do not contain all three of (a) a printer type identification, (b) a plurality of substitute printer driver identifications associated with the printer type identification, and (c) a compatibility rating associated

with each substitute printer driver identifications. In fact, Gunji mentions absolutely nothing of a plurality of substitute printer driver identifications associated with the printer type identification and a compatibility rating associated with each of the plurality of substitute printer driver identifications.

Gunji's paragraph [0051] is reproduced as follows:

[0051] The printer drivers are provided by the manufacturers of the respective printers PRT 1 and PRT 2 and are generally subjected to iterative version-up. The version-up printer driver is supplied via the Internet by the Web server 100. The management system 10 regularly monitors the Web server 100 and fetches and holds the printer driver of the latest version. As discussed later, information for supporting fetch of the printer driver by the management system 10 is stored in the Web server 100. The management system 10 corresponds to the information collection system of the present invention. The Web server 100 corresponds to the support system of the present invention.

Contrary to the Examiner's position, paragraph [0051] cannot be reasonably construed to infer that the printer driver for PRT1 or PRT2 includes a plurality of substitute printer driver identifications associated with the printer type identification of PRT1 or PRT2. In fact, paragraph [0051] neither mentions nor infers including any type of substitute printer type identifier in a printer driver file stored in Gunji's driver database (22).

Gunji's paragraph [0004] is reproduced as follows:

[0004] There are a number of printer driver programs according to the type of the printer, the operating system, the language, and the version. It is thus required for the user to select an appropriate printer driver for installation. In many cases, the printer driver program of a later version than the version of the program stored in a medium packed with the printer main body is provided in a predetermined Web site on the Internet. It is thus desirable to fetch the update information of the printer driver and acquire the printer driver of the up-to-date version. There is, however, difficulty for the general users in adequately installing the printer driver by taking into account such situations. In the network connecting with a large number of clients, a specific manager stores an optimum printer driver in the management system. The user downloads and installs the printer driver stored in the management system.

Contrary to the Examiner's position, paragraph [0004] cannot be reasonably construed to infer that the printer driver for PRT1 or PRT2 includes a compatibility rating associated with each of the plurality of substitute printer driver identifications included in that printer driver. In fact, paragraph [0004] neither mentions nor infers including any type of compatibility rating data in a printer driver file stored in Gunji's driver database (22).

For at least these reasons, Claim 1 is patentable over Gunji as are Claims 2-5, 7-9, and 12 which depend from Claim 1.

Claim 17 is directed method implementation of Claim 1. For at least the same reasons Claim 1 is patentable over Gunji, so are Claim 17 and Claim 18 which depends from Claim 17.

Claim 25 is directed to an apparatus implementation of the system of Claim 1. For at least the same reasons Claim 1 is patentable over Gunji, so are Claim 25 and Claim 26 which depends from Claim 25.

Claim 27 is directed to a system that includes various means for implementing the method of Claim 17. Thus, for at least the same reasons Claims 1 and 17 are patentable over Gunji, so is Claim 27.

Claim Rejections – 35 USC §103: Claims 10-16, 18, 29, and 34 stand rejected as being obvious over Gunji alone or in view of another reference. Claims 10, 11, 13-16, 29, and 34 have been cancelled and will not be addressed.

Claim 12 depends from Claim 1 and is patentable based at least in part on that dependency.

Claim 18 depends from Claim 17 and is patentable based at least in part on that dependency.

Conclusion: It is requested that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue.

Respectfully submitted,
Ward S. Foster

By /Jack H. McKinney/
    Jack H. McKinney
    Reg. No. 45,685

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Tele: (208) 396-4140